

# **EXHIBIT B**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION )  
OPIATE LITIGATION )  
MDL No. 2804  
THIS DOCUMENT RELATES TO: ) Case No. 17-md-2804  
Track Three Cases )

VIDEOTAPED DEPOSITION OF APRIL J. CARAWAY  
Conducted via Zoom  
Warren, Ohio  
Friday, December 4th, 2020

REPORTED BY: GREG S. WEILAND, CSR, RMR, CRR  
JOB NO.: 4342602

1 used over time. Opium, you know, in different  
2 forms, even as other medicines, it's highly  
3 addictive.

4 Q. Okay. And I appreciate that. That's  
5 good. I'm not trying to test your, you know,  
6 textbook knowledge of it.

7 But when you say the word "opioid," I  
8 asked you a question about opioid, I want to make  
9 sure we're understanding each other.

10 Do you understand that there are both  
11 prescription and illicit opioids? You understand  
12 that, right?

13 A. Yes.

14 Q. And you're aware that prescription opioids  
15 are legal medications in the United States, correct?

16 MR. BADALA: Objection to form.

17 THE WITNESS: Correct.

18 BY MR. MANNIX:

19 Q. Do you understand that there are --  
20 prescription opioids are approved by the FDA?

21 A. I'm assuming they are, yes.

22 Q. And do you have an understanding that  
23 they, prescription opioids, serve a purpose in  
24 helping patients?

25 MR. BADALA: Objection to form.